

1 JEROME C. ROTH (State Bar No. 159483)
jerome.roth@mto.com

2 HOJOON HWANG (State Bar No. 184950)
hojoon.hwang@mto.com

3 MIRIAM KIM (State Bar No. 238230)
miriam.kim@mto.com

4 MUNGER, TOLLES & OLSON LLP
560 Mission Street, Twenty-Seventh Floor
5 San Francisco, California 94105-2907
Telephone: (415) 512-4000
6 Facsimile: (415) 512-4077

7 WILLIAM D. TEMKO (State Bar No. 98858)
william.temko@mto.com

8 MUNGER, TOLLES & OLSON LLP
355 S. Grand Avenue, Thirty-Fifth Floor
9 Los Angeles, California 90071-1560
Telephone: (213) 683-9100
10 Facsimile: (213) 687-3702

11 *Attorneys for Defendant LG Electronics, Inc.*

12
13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

15 IN RE: CATHODE RAY TUBE (CRT)
16 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC

MDL No. 1917

17 This Document Related to:

18 DIRECT PURCHASER ACTIONS

**DECLARATION OF CATHLEEN H.
HARTGE AND EXHIBITS IN SUPPORT
OF DEFENDANT LG ELECTRONICS,
INC.'S REPLY IN SUPPORT OF
MOTION FOR PARTIAL SUMMARY
JUDGMENT ON WITHDRAWAL
GROUNDS**

**[Def. LGE's Reply ISO Motion for Partial
Summary Judgment and Declaration of
Duk Chul Ryu filed concurrently herewith]**

Judge: Honorable Samuel Conti

Date: February 6, 2015

Time: 10:00 a.m.

Crtrm.: 1, 17th Floor

25
26
27
28 Master File No. 3:07-cv-05944-SC

**DECLARATION OF CATHLEEN H. HARTGE AND EXHIBITS IN SUPPORT OF DEFENDANT LG
ELECTRONICS, INC.'S REPLY IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT ON
WITHDRAWAL GROUNDS**

1 I, Cathleen H. Hartge, hereby certify and state as follows:

2 I am an attorney licensed to practice law in the State of California. I am an associate in the
3 law firm of Munger, Tolles & Olson LLP, counsel of record for Defendant LG Electronics, Inc.
4 (“LGE”) in the above-entitled action. I make this declaration based on my personal knowledge
5 and, if called upon as a witness, could and would testify competently as to the matters set forth
6 below. I submit this declaration in support LGE’s Reply In Support of its Motion for Partial
7 Summary Judgment on Withdrawal Grounds.

8 1. Attached to this declaration as Exhibit A is a true and correct copy of a document
9 produced in this case and Bates stamped as CHU00123358 and CHU00123358E (Chinese and
10 Certified Translation English versions) dated March 21, 2004.

11 2. Attached to this declaration as Exhibit B is a true and correct copy of a document
12 produced in this case and Bates stamped as LGE00065498 and LGE00065498E (Korean and
13 Certified Translation English versions) dated September 29, 2006.

14 3. Attached to this declaration as Exhibit C is a true and correct copy of excerpts
15 from the deposition of Frans Spaargaren deposed in this case on August 27, 2014.

16 4. Attached to this declaration as Exhibit D is a true and correct copy of the
17 bankruptcy judgment for LG.Philips Displays Holding B.V. (Dutch and Certified Translation
18 English versions).

19
20 I declare under penalty of perjury under the laws of California that the foregoing is true
21 and correct. Executed on the 23rd day of January, 2015 in San Francisco, California.
22

23 /s/ Cathleen H. Hartge
24 CATHLEEN H. HARTGE
25
26
27
28